

**COMMENTS OF
RICHARD D. GELFMAN, OWNER
WCTR BROADCASTING, LLC
ON PROPOSED RULEMAKING 07-172**

WCTR-AM is a 1,000 watt daytime-only station operating on Maryland's Eastern Shore. We strongly urge the Commission to adopt new rules which would allow daytime-only stations such as ourselves to better serve our local communities by granting the right to use FM translators (or any other means) to operate at night. As a matter of fact, without this ability, I do not believe that daytime AM stations can continue to survive.

It's not news to anyone that we are in a highly competitive business, one that is rapidly changing. Listeners today have many choices, from satellite to iPod, to internet streaming. Every other choice a consumer has can be heard at any time. The exception is the AM daytime-only which must power down and go off the air at sunset, and cannot return to operation until sunrise.

That simply does not serve our local communities. We are trying to deliver quality local content to our communities of Kent & Queen Anne's counties. We cover local news every day. We provide constant, up-to-date weather forecasts (important for an agricultural area). We cover high school and college sports. We attend and broadcast meetings of our government officials. We are the emergency broadcast station for our community and have a county-provided generator to keep us on the air to provide information to our communities in case of a disaster or emergency. **WE STRESS LOCAL COVERAGE OF LOCAL EVENTS FOR OUR LOCAL COMMUNITY.**

But as a daytime-only station, we cannot always be there for our local community. News and weather happen around the clock, town meetings are at night, high schools games are played in the evening, emergencies happen after the sun goes down, etc. etc. etc. But as an AM daytime-only station, we can't always be there when our community needs us.

Not only does that, I believe, hurt our local community, but it hurts us financially. In the winter months, in the crucial drive times, we are either off the air or in "critical hours" so our signal is not heard throughout our broadcast area. For example, there are many mornings on the Eastern Shore where the heavy fog means that certain area schools will open 2 to 3 hours late. But by the time we're on the air, it's too late to provide that information to our community.

Our community depends on volunteer fire companies, but when the town alarms sound in the evening or early morning, most people have no idea what's going on and where since we're off the air.

In order to survive, a local AM radio station needs to serve the local community, and we simply cannot do that the way the community deserves to be served when we are on the air for only a limited period of time every day.

The other radio stations whose signals come into our community simply don't serve the local community the way we can. They don't cover local news and community events. They don't cover local politics, or what happens in our local courthouse, school, or town hall. They don't cover crime or local church services. In our town, Chestertown, there is one newspaper – a weekly – and we are the only other source of local news and events. Our service to our local community should not be so seriously limited by rules that require us, as a vital community resource, to go off the air.

It should also be noted that we do not have Pre Sunrise Authority from the FCC, and when we tested our Post Sunset Authority power, our authorized power is so low that the signal traveled no further than about 1 mile from our broadcast tower. But even if we had more PSRA and PSSA power, it begs the issue. The point is, we should be able to serve our local community around the clock because events happen around the clock.

For all the above reasons, and many more, I urge the Commission to adopt rules which would allow AM daytime-only stations, like WCTR, to broadcast on FM translators (or by any other means) when their AM facility must go off the air. Not only do we need it, but our community deserves it.

Sincerely,

Dick Gelfman
WCTR Broadcasting, LLC